

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

KAMAL MUZAFFAR, M.D.,

Plaintiff,

-vs-

File No. 13-CV-744-NJ

AURORA HEALTH CARE SOUTHERN
LAKES, INC.,

Defendant.

**AFFIDAVIT OF ATTORNEY MICHAEL J. FRAZIER OPPOSING
DEFENDANT'S MOTIONS FOR SUMMARY JUDGMENT**

STATE OF WISCONSIN)
) ss.
COUNTY OF WALWORTH)

MICHAEL J. FRAZIER, being first duly sworn, on oath, deposes and says:

1. I am one of the attorneys for Kamal Muzaffar, M.D., the Plaintiff in the above-captioned matter.

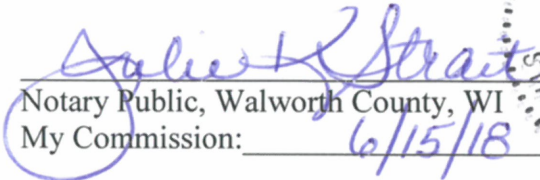
2. On April 13, 2015, I made a public records request to the Wisconsin Department of Health Services, Division of Quality Assurance ("DHS"), for copies of reports and documents relating to any DHS investigation of the Emergency Medical Treatment and Active Labor Act ("EMTALA"), 42 U.S.C. § 1395dd, relating to or arising from the DHS survey of patients at Mercy Walworth Hospital & Medical Center that has been put in evidence in this action. (R. Doc. 83-4.) A true and accurate copy of my public records request is attached hereto as Exhibit A.

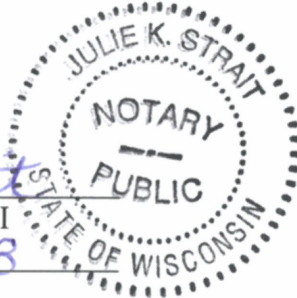
3. Attached hereto as Exhibit B is a true and accurate copy of the letter I received from DHS in response to my public records request, dated April 15, 2015.

Further affiant sayeth not.


Michael J. Frazier (1031829)

Subscribed and Sworn to Before Me
this 26th day of June, 2015.


Notary Public, Walworth County, WI
My Commission: 6/15/18



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